

Counting Months



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How to Listen In

- This webinar will be held in “listen only” mode
- There are two ways to listen
 - Via Computer
 - Via Phone



How to Ask Questions

- Use the question box to ask your question any time during the presentation.
- At the end of the presentation, we will address as many questions as possible.
- We will follow-up on questions that we cannot get to during the allotted presentation time.

Note: This webinar will be recorded. A copy of the recording and all presentation materials will be provided after the presentation.

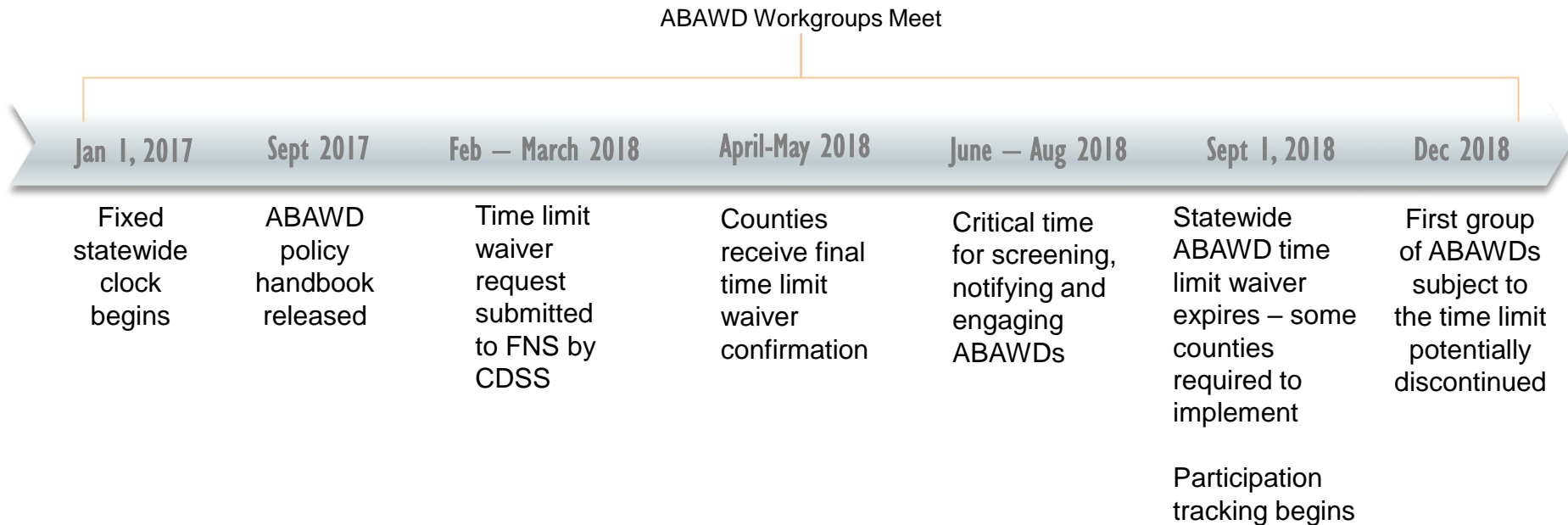
Upcoming Webinars

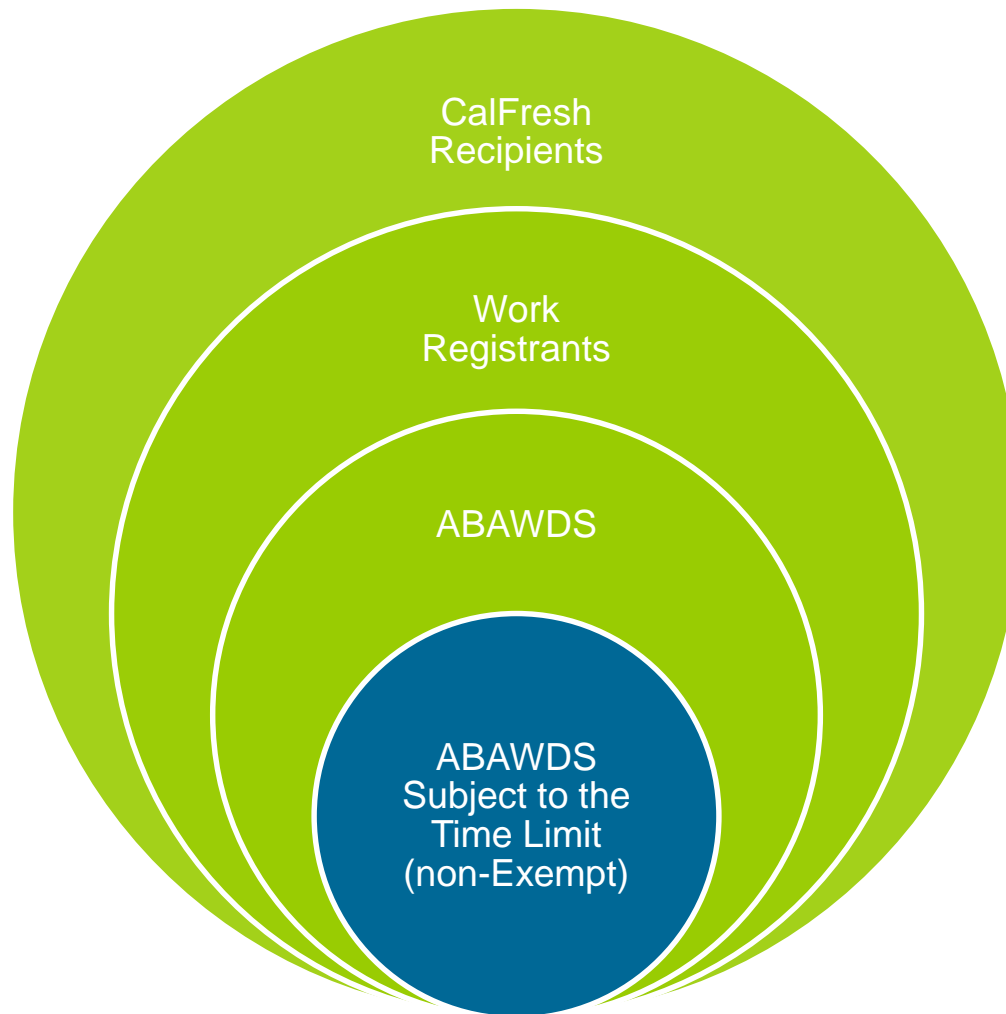
Date	Time	Topic
November 14 th	10-11am	Regaining Eligibility
December 12 th	10-11am	15 Percent Exemption Policy
January 9 th	10-11am	ABAWD Clock, Reporting and MEDS

Today's Agenda

- Review California's Implementation Timeline
- ABAWD Time Limit Review
- Counting Months
- Key Discussion Points
- Q&A

California's ABAWD Implementation Timeline





Review: ABAWD Time Limit Rule

- ABAWD eligibility limited to 3 full months in a 36-month period while not fulfilling the work requirement or otherwise exempt.

Applies to individuals that:

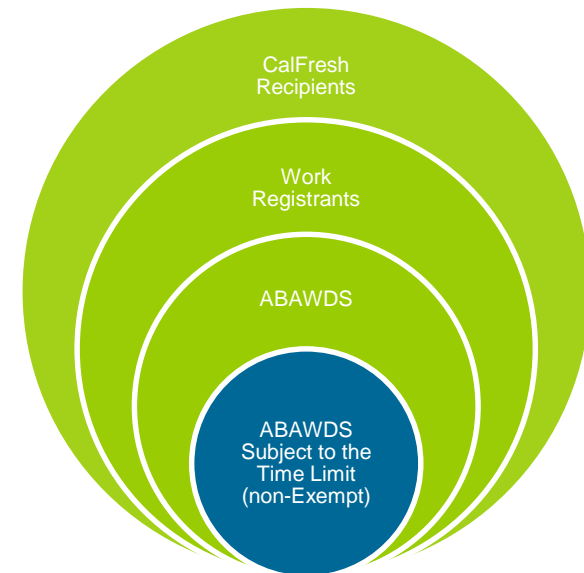
- Are age 18 – 49
- Have no dependents
- Do not qualify for an exemption

Requires:

- ABAWDs to satisfy the ABAWD work requirement
 - Work or participate in a qualifying work activity for at least 20 hours per week or 80 hours averaged monthly

Webinar Training Series Recap

- ABAWD 101
- ABAWD Exemptions
- Satisfying the ABAWD Work Requirement



Identifying a Countable Month

- Any month in which an ABAWD receives a full month of CalFresh benefits while **NOT**:
 - Exempt from the 3-month time limit
 - Fulfilling ABAWD work requirements
 - Living in a waived county
 - In receipt of the 15 percent exemption
- ABAWDs are only allowed 3 countable months during the 36-month period.



Establishing a Countable Month

- Mandatory mid-period report
- Drop in work hours known to the county
 - Participating in E&T
 - Workfare
 - Other county work programs
- Coded with an “N” from another county in MEDS
 - 36 month record must be assessed
- Evidence of the use of a countable month in another state

Use of Countable Months Out of State

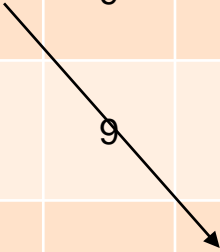
- Countable months can be accrued in any state implementing the ABAWD time limit
- Use of countable months must be checked at application
 - MEDS record must be updated no matter waiver status
- The CWD **must** verify countable months used while residing out of state
- The CWD must update the client's record to reflect countable months used

Verification: Written or verbal statement or printed image of the individual's 36-month record from the other state agency

Out of State Countable Month Example (Exemption)

Consecutive use of countable months out of state with different exemptions

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2017	9	9	9	9	9	9	9	9	9	9	9	9
2018	9	9	9	9	9	9	9	9	9	P	N	N
2019	N	9	9	9	9	9	E	E	E	E	E	E



P = Received partial month of benefits; W = Met the work requirement;
 N = Received countable month; C = three consecutive months; Z= Residing
 in a waived area; 9 = Inactive/Ineligible

Out of State Countable Month Example (Different Fixed Clock)

- If an ABAWD used a countable month in another state, the CWD must count that month, even if they would have been exempt in California

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2019	N	W	W	W	W	W	W	W	9	9	9	9
2020	P	W	W	W	N	W	W	W	W	N	W	W
2021	W	W	W	W	W	W	9	9	9	9	9	9
2022	9	9	P	W	W	W	N	W	W	W	W	W

Examples of Countable Month

- ABAWD that is 49 and worked 15 hours every week this month?
 - Countable
- ABAWD that is not meeting the work requirement, not otherwise exempt, and not receiving a 15% exemption?
 - Countable

Identifying a Non-Countable Month

Any month in which the individual:

- Satisfies the ABAWD work requirement;
- Receives a prorated/partial month of benefits;
- Turns 50 during any part of the month;
- Qualifies for an exemption during any part of the month;
- Is receiving a 15% exemption; or
- Has good cause



Good Cause

- May be determined for those who fail to satisfy the work requirement for reasons outside of their control
- Includes, but is not limited to:
 - Illness (personal or of another household member)
 - Household emergency
 - Lack of transportation
- Good cause provisions can be found at MPP 63-410.221 and 63-407.51

Non-Countable Month Examples

- ABAWD that applies for benefits on the 2nd?
 - Non-countable (Partial Month)
- ABAWD that catches the flu one week into the month and will not meet the work requirement for the rest of the month?
 - Non-countable (Good Cause)

Tracking Countable Months

- CWDs must track an ABAWDs usage of countable months
- Participation will be tracked using various tracking codes
 - N = Received countable month
- Countable months do not need to be used consecutively
- The 36-month record remains with the individual even if the client moves to another CalFresh household

Breaks in Participation

- CWDs must track countable months over the 36-month period even if there are breaks in an ABAWD's participation.
- Causes for an ABAWDs break in participation:
 - Temporarily found sufficient employment
 - Qualified for an exemption
 - Stopped participating in CalFresh
 - Experience other circumstances that may have caused them to use their three countable months non-consecutively



It's okay to
**TAKE A
BREAK!**

Sample 36-Month Record: Consecutive Use of Countable Months

First Year Implementation Example

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2017	Z	Z	Z	Z	Z	Z	Z	Z	Z	Z	Z	Z
2018	Z	Z	Z	Z	Z	Z	Z	Z	N	N	N	9
2019	9	P	W	W	W	W	W	C	C	C	W	W

P = Received partial month of benefits; W = Met the work requirement;
N = Received countable month; C = three consecutive months; Z= Residing in a
waived area; 9 = Inactive/Ineligible

Sample 36-month Record (Non-consecutive)

Non-consecutive use of countable months with breaks in participation

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2020	N	W	W	W	W	W	W	W	9	9	9	9
2021	P	W	W	W	N	W	W	W	W	N	W	W
2022	W	W	W	W	W	W	9	9	9	9	9	9

P = Received partial month of benefits; W = Met the work requirement;
 N = Received countable month; C = three consecutive months; Z= Residing
 in a waived area; 9 = Inactive/Ineligible

Moving within the State

- Certain counties will retain their waiver
- Moving DOES NOT restart the three-month time limit
- The record remains with the client until a new 36-month period begins
- Counting months is based on the waiver eligibility of where the client resides



Moving to a Waived Area

- An ABAWD is no longer subject to the time limit if they move to a waived area
 - They do not need to satisfy the work requirement
- If they have already used their three countable months, they are now eligible to receive CalFresh benefits again
- ABAWDs must still be tracked when moving to a waived area



Moving to a Non-Waived Area

- The ABAWD will become subject to the time limit.
- Because they are now subject to the time limit, the client must:
 - Meet the work requirement,
 - Be receiving a 15% exemption, or
 - Be otherwise exempt



*Months where full CalFresh benefits were received will be countable

Inter-County Transfer (ICT) Implications

- When an ABAWD subject to the time limit moves to a non-waived county, the receiving county is responsible for determining the ABAWD's status
- Status must be determined the month the ICT is complete
 - Is the ABAWD satisfying the work requirement?
- Receiving county should screen the ABAWD
- The receiving county is now responsible for the ABAWD until they move again

ICT Tracking

- The receiving county is responsible for tracking an ABAWD the month the ICT is complete and moving forward
- Receiving county should:
 - Determine the ABAWD's status
 - Complete the corresponding tracking
 - ❖ This must be done no matter whether the county is waived or non-waived.
- If the county is waived, tracking code “Z” will be submitted
- If the county is non-waived, the receiving county will submit the code that reflects their ABAWD status

Exhaustion of Countable Months

- An ABAWD that has exhausted their 3 countable months will be discontinued
- The ABAWD becomes ineligible to participate in CalFresh the month after the last countable month is received
 - Single ABAWD CalFresh household:
 - Case will be discontinued
 - ABAWD in CalFresh household with other eligible members:
 - The ineligible ABAWD will be excluded from the CalFresh benefits.
- The ABAWD must become exempt, regain eligibility, or move to a waiver county to be eligible to participate in the CalFresh program again.

Losing eligibility

- CWDs must discontinue an ABAWD's CalFresh benefits with timely and adequate notice.
- CWDs must send the Notice of Discontinuance for Failure to Meet the ABAWD work requirement
 - Sent no later than 10 days into the month following the individual's third countable month
- Timely and adequate notice

Responsibilities of the CWD

- Explain all ABAWD requirements to the household including:
 1. Which individuals are currently subject to the ABAWD time limit;
 2. Which individuals are potential ABAWDs even if the individual is exempt at the time of application;
 3. The 36-month period fixed time clock;
 4. The ABAWD's 3 countable months;
 5. ABAWD exemptions; and
 6. How to satisfy the work requirement

Key Takeaways

- Ensure that only full months of CalFresh benefits are being counted
- Ensure that proper screening is completed to identify months that are non-countable
- Ensure that months are retroactively being “counted” or “uncounted”
- Ensure that correct tracking codes are being used to establish ABAWD status
- The receiving county is responsible for tracking the ABAWD’s status
- Countable months can be accrued in any state
- An ABAWD will be discontinued after they exhaust their 3 countable months
- ABAWD’s should receive timely and adequate notice upon losing eligibility

Questions



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Resources

- CalFresh Work Registration
 - [ACIN I-01-13](#) – Policies and Procedures For CalFresh Work Registration
 - [MPP 63-407](#) – Work Registration Requirements
 - [7 CFR 273.7](#) – Work Provisions
- ABAWD Time Limit
 - [ACL 16-24](#) – CalFresh Summary of the ABAWD Time Limit
 - [MPP 63-410](#) – Work Requirements for ABAWDs
 - [7 CFR 273.24](#) – Time Limit for Able-Bodied Adults
 - [USDA FNS ABAWD Page](#)

Thank You!



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